

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

GREAT NORTHERN INSURANCE CO.  
As subrogee of Juan A. Rodriguez Vila and  
Iwalani Rodriguez

CIVIL NO. 11-1303 (DRD)

Plaintiff

Vs.

EL LEGADO PROPERTY MANAGEMENT  
COMPANY, INC.; EL LEGADO DE CHI CHI  
RODRIGUEZ GOLF RESORT, INC.;  
EL LEGADO DE CHI CHI RODRIGUEZ  
GOLF RESORT, (SC) SE; EL LEGADO  
HOMEOWNER'S ASSOCIATION, INC, and  
EL LEGADO CONDOMINIUM, REGIME I

Re: NEGLIGENCE, BREACH OF  
CONTRACT, & BREACH  
OF WARRANTY

Codefendants

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**MOTION FOR EXTENSION OF TIME UNTIL 3/26/2012 TO FILE  
RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR  
RELIEF UNDER RULE 56 (D) (Docket No. 54)**

TO THE HONORABLE COURT:

COMES NOW REAL LEGACY ASSURANCE COMPANY, INC, through the undersigned counsel and without submitting to this Honorable Court's jurisdiction, respectfully sets forth and prays:

1. Plaintiff filed a Motion For Relief Under Rule 56 (D), in response to the motion to dismiss pursuant to Fed. Civ. R. 12(b)(6) filed by Real Legacy Assurance Company, Inc. in the case at bar. (See Docket No. 54). Plaintiff has not opposed Real Legacy's motion to dismiss. Instead, plaintiff requests an order for relief, to do discovery pursuant to Fed. Civ. R. 56 (D).
2. The undersigned has been working non stop for the last two weeks in other cases, in which motions and other writings have become due or will become due during next week.

2.

WHEREFORE, Real Legacy very respectfully requests from this Honorable Court to grant it until 3/26/2012 to respond to plaintiff's motion at Docket 54.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 16<sup>th</sup> day of March, 2012.

*S/ Ernesto R. Irizarry*

**ERNESTO R. IRIZARRY**

USDC-PR No. 126702

Attorney for

REAL LEGACY ASSURANCE  
COMPANY, INC.

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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date a true and exact copy of the foregoing has been filed electronically with the Clerk of the Court via CM/ECF system which will send notification of such filing via e-mail to all the attorneys of record.

S/ ERNESTO R. IRIZARRY

**ERNESTO R. IRIZARRY**

